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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
RESPONSE TO WAYMO'S MOTION
FOR RELIEF FROM NON-DISPOSITIVE
PRETRIAL ORDER OF MAGISTRATE
JUDGE AND EXHIBIT THERETO(DKT.
917)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Portions of Their Response to Waymo’s Motion for Relief From Non-Dispositive Pretrial Order of
8 Magistrate Judge and Exhibit Thereto (Dkt. 917) (the “Administrative Motion”). The Administrative
9 Motion seeks an order sealing highlighted portions of Defendants’ Response to Waymo’s Motion for
10 Relief (“Uber’s Response”) and the entirety of Exhibit A to the Declaration of Arturo Gonzalez
11 (“Exhibit A”).

12 3. The green highlighted portions of Uber’s Response and the entirety of Exhibit A
13 contains or refers to confidential business information, which Waymo seeks to seal.

14 4. Uber’s Response (portions highlighted green) and Exhibit A (entire document) contain,
15 reference, and/or describe Waymo’s highly confidential and sensitive business information. The
16 information Waymo seeks to seal regards the confidential analysis of Waymo’s business and
17 competition, as well as its market strategy. I understand that this confidential business information is
18 maintained by Waymo as secret. The public disclosure of this information would give Waymo’s
19 competitors access to in-depth descriptions—and analysis—of Waymo’s business strategy for its
20 autonomous vehicle system. If such information were made public, I understand that Waymo’s
21 competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Response and
23 Exhibit A that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on July 21, 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Lindsay Cooper.
11

12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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